

IN THE UNITED STATES DISTRICT COURT
FOR THE ~~MIDDLE~~ DISTRICT OF ~~PENNSYLVANIA~~
SOUTHERN New York

(1) TONIA' SCOTT 19-11057 :

(Name of Plaintiff) (Inmate Number) :

NORRISTOWN STATE HOSPITAL :
1001 STERIGERE STREET, 51-C1 :
NORRISTOWN, PA 19401-5397. :

(Address) :

(2) TONIA' SCOTT 19-11057 :

(Name of Plaintiff) (Inmate Number) :

SAME AS ABOVE :

(Address) :

(Each named party must be numbered,
and all names must be printed or typed)

vs.

CIVIL COMPLAINT

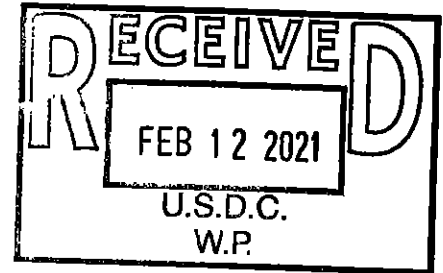
(1) RAYMOND TONKIN :

(2) CRAIG LOWE :

(3) AND ET AL. :

(Names of Defendants) :

(Each named party must be numbered,
and all names must be printed or typed)



TO BE FILED UNDER: ☒ 42 U.S.C. § 1983 - STATE OFFICIALS

☐ 28 U.S.C. § 1331 - FEDERAL OFFICIALS

I. PREVIOUS LAWSUITS

A. If you have filed any other lawsuits in federal court while a prisoner, please list the caption and case number including year, as well as the name of the judicial officer to whom it was assigned:

1. Filed Habeas Corpus (20CV0828), U.S. District
Ct. of Middle Pennsylvania, Judge Yvette KANE

2. Filed 42 USCS 1983 (20CV5412), US District
Ct of Eastern Pennsylvania, Judge Eduardo Robreno

II. EXHAUSTION OF ADMINISTRATIVE REMEDIES

In order to proceed in federal court, you must fully exhaust any available administrative remedies as to each ground on which you request action.

- A. Is there a prisoner grievance procedure available at your present institution? ____ Yes ☒ No
- B. Have you fully exhausted your available administrative remedies regarding each of your present claims? ____ Yes ☒ No

C. If your answer to "B" is Yes:

1. What steps did you take? N/A
- N/A
2. What was the result? N/A
- N/A

- D. If your answer to "B" is No, explain why not: Plaintiff never
contracted with P.C.C.F. jail AND/or any of
the Defendants.

III. DEFENDANTS

- (1) Name of first defendant: (Please view the enclosed)

Employed as _____ at _____

Mailing address: _____

- (2) Name of second defendant: _____

Employed as _____ at _____

Mailing address: _____

- (3) Name of third defendant: _____

Employed as _____ at _____

Mailing address: _____

(List any additional defendants, their employment, and addresses on extra sheets if necessary)

IV. STATEMENT OF CLAIM

(State here as briefly as possible the facts of your case. Describe how each defendant is involved, including dates and places. Do not give any legal arguments or cite any cases or statutes. Attach no more than three extra sheets if necessary.)

1. Plaintiff pleads to the Court an injunction restraining
further imprisonment in Plaintiff 42 USC 1983 complaint, as
such Plaintiff 42 USC 1983 complaint, should be treated as.

2. Plaintiff is Not A State Citizen. Plaintiff is A citizen from A Native American/INDIAN Tribe recognized by the state -s of New York AND Pennsylvania. Yet Plaintiff was charged with State offenses on INDIAN Title LAND (INDIAN Country), CONTRADICTING 25 USC 2, Sec 1.4, 25 USC 1321 AND 25 USC 1324.
3. Plaintiff gave No personal jurisdiction to the Courts of. PIKE County NOR has Plaintiff CONTRACTED for housing AND/or services with PIKE County Correctional Facility AND/or Norristown State Hospital. Yet Plaintiff UNAUTHORIZED CUSTODY WAS PRODUCED. FALSE IMPRISONMENT FOR Plaintiff, 35 C.J.S. 9-10.

V. RELIEF

(State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.)

1. Extra Ordinary Relief - Plaintiff pleads to the Court, ~~a~~ preliminary injunction AND/or temporary restraining order to immediately restrain Plaintiff FALSE imprisonment at Norristown State Hospital; in the UNAUTHORIZED custody of Defendant Jessica Keith.
2. Prospective Injunctive Relief - Plaintiff entreat to the Court for relief from Defendants: (State Actors), Raymond Tonkin, Jessica Keith, Lt Michael Joyce, Lt Floyd Bowen, DR. Bagchi, DR. Fakiyasi, Nurse Toto, Nurse Lynn AND Josh Shapiro.
3. Injunctive Relief - Plaintiff beseech to the Court for injunctive relief from Defendants: Gregory Chelak, Matthew M. Osterberg AND Craig Lowe.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 31st day of JANUARY, 20 21:

Imia Scott, P.C.
(Signature of Plaintiff)

PRINCIPAL CHIEF TONIA SCOTT'S
Defendants

- ① Raymond Tonkin
506 Broad Street
Milford, PA 18337
- ② Craig Lowe
Pike County Correctional
Facility
175 Pike County Blvd.
Lords Valley, PA 18428
- ③ Jessica Keith
Norristown State Hospital
1001 Sterigere Street
Norristown, PA 19401-
5397
- ④ Dr. Sudarshan Bagchi
Norristown State Hospital
1001 Sterigere Street
Norristown, PA 19401-
5397
- ⑤ Lt. Floyd Bowen
PSP. Blooming Grove
434 Route 402.
Hawley, PA 18428
(570) 226-5718.
- ⑥ Lt. Michael Joyce
PSP Blooming Grove
434 Route 402
Hawley, PA 18428
(570) 226-5718.
- ⑦ Gregory Chelak
Pike County Courthouse
412 Broad Street
Milford, PA 18337.
- ⑧ Matthew M. Osterberg
506 Broad Street
Milford, PA 18337.

9. Attorney General of Pennsylvania, Josh Shapiro.
Office of Attorney General
14th Floor, Strawberry Square
Harrisburg, PA 17120
(P) 717-787-0822.

10. Dr. Fakiyasi
Norristown State Hospital
1001 Sterigere Street
Norristown, PA 19401

11. Nurse Lynn
Norristown State Hospital
1001 Sterigere Street
Norristown, PA 19401

12. Nurse Toto
Norristown State Hospital
1001 Sterigere Street
Norristown, PA 19401-5397

(TONIA' SCOTT) List of Exhibits 1/21/21

- A. New York State Supreme Court, recognition of Tribe
- B. PENNSYLVANIA General Counsel, recognition of Tribe
- C. PENNSYLVANIA Attorney General, recognition of Tribe
- D. ~~B~~ Lehigh County Court (PA), recognition of Tribe
- E. TONIA' SCOTT, INDIAN STATUS, recognition (US District Ct)
- F. INDIAN Title, PINE RIDGE (RIDGE)
- G. INDIAN Title, SAW CREEK
- H. Decree # 11
- I. 25 USC 1321/1755 (Assumption by State of Criminal)
- J. 25 USC 1324 (Amendment of State Constitution & etc)
- K. 25 USC 2, Sec 1.4. (State or Local LAWS DO NOT APPLY)
- L. Dept of Interior/BIA (INDIAN Title)
- M. Tribal ID.
- N. Tribal License Plate.
- O. P.L. 1154, 48hrs duration in jail.
- P. PIKE County Court, letter of Commitment into NSH.
- Q. List of Items in Tribal CAR.
- R. Court of PIKE County Letter/Petition to Release Property
- S. Court of PIKE County Letter/Petition to Dismiss Charges
- T. Court of PIKE County reply to Petition to Dismiss Charges
- U. Court of PIKE County reply to Petition to Release Property

List of Exhibits

12/30/20

- A. New York State Supreme Court, recognition of Tribe
- B. Pennsylvania General Counsel, recognition of Tribe
- C. Pennsylvania Attorney General, recognition of Tribe
- D. Lehigh County Court (PA), recognition of Tribe
- E. Toniah Scott, Indian Status, recognition (U.S. District Ct)
- F. INDIAN Title, ~~PINE~~ RIDGE
- G. INDIAN Title, Saw Creek.
- H. DECREE # 77
- I. 25 USC 1321/1755 (Assumption by State of Criminal)
- J. 25 USC 1324 (Amendment of State Constitution & etc)
- K. 25 USC 2, Sec 1.4 (State or Local Laws Do Not Apply)
- L. Dept. of Interior/BIA (INDIAN Title)
- M. Tribal ID
- N. Tribal License Plate
- O. P.L 1154, 48 hrs DURATION in jail
- P. PIKE County Court, letter of Commitment into NSH.
- Q. List of Items in the Tribal Car.
- R.

In the United States District Court
 Case 1:21-cv-01306-EM Document 2 Filed 02/12/21 Page 9 of 40
 For the ~~Southern~~ District of ~~Pennsylvania~~
 Southern New York.

Tonia Scott,
 Plaintiff/Petitioner

V.

Raymond Tonkin,
 Defendant

AND

Jessica Keith,
 Defendant

AND

ET AL.

CASE Number:
~~2021-54112~~

Petition to Remove State
 Criminal Prosecution into
 the U.S. District Court
 ADD DEFENDANTS AND A
 CHANGE OF VENUE

Now Comes, Plaintiff Petition to Remove State Criminal
 Prosecution into the U.S. District Court, ADD DEFENDANTS
 AND A CHANGE OF VENUE. Plaintiff beseech the Court
 to allow the enclosed Petition to accompany Plaintiff
 42 USC 1983 Complaint Plaintiff brings this Act-
 -ion in reply to Pike County Court of Common
 Pleas cases, CP-52-CR-0000211-2020; CP-52-
 CR-0000096-2020 AND CP-52-CR-0000687-2019.

28 USC 1455

Plaintiff entreat the Court to declare the Comm-
 -onwealth of Pennsylvania criminal charges/
 offenses against Plaintiff INVALID AS STATED
 IN Plaintiff Relief of Section III. Plaintiff

DECLARATION REQUEST ANY/ OR DISMISSAL IS IN ACCORD-
-ANCE to USC, Title 28, Chapter 89, Section 1455
(28 USC 1455), in which the U.S. District Court
may remove the State Court criminal prosecution
into the jurisdiction of the U.S. District Court.

"COMPLAINT UNDER 42 USC 1983, SHOULD HAVE BEEN
TREATED AS PETITION FOR HABEAS CORPUS, WHERE
STATE PRISONER REQUESTED DECLARATION THAT HIS
CONVICTION WAS INVALID, AND INJUNCTION RESTRAIN-
-ING HIS FURTHER IMPRISONMENT." See BENNETT V.
ALLEN, 396 F. 2d. 788 (1968).

AS SUCH, PLAINTIFF PROCLAIMS THAT THE COMMONWEALTH
OF PENNSYLVANIA CRIMINAL OFFENSES/CHARGES ARE IN
VIOLATION OF THE INDIAN CIVIL RIGHTS ACT AND
THE CIVIL RIGHTS ACT OF 1968:

1. Title IV, Section 401 (25 USC 1321)
{ASSUMPTION BY STATE OF CRIMINAL JURISDICTION}
- 2 Title IV, Section 402 (25 USC 1322)
{ASSUMPTION BY STATE OF CIVIL JURISDICTION}
3. Title IV, Section 404 (25 USC 1324)
{CONSENT TO AMEND STATE LAWS}

A. "ANY ACTION CHARGING VIOLATION OF INDIAN
CIVIL RIGHTS ACT, IS WITHIN JURISDICTION
OF A FEDERAL COURT." SEE BRUNETTE V.

B. 28 USC 1331, "The District Court shall have original jurisdiction of all civil actions arising under the Constitution, laws or treaties of the United States";

C. "It was intent of Congress enacting Indian Civil Rights Act to create body of substantive Rights, patterned in part on Federal Bill of Rights AND to place jurisdiction, in case of violation of those rights, in District Courts". SEE SOLONAN V. LARASE, 335 F. Supp. 715 (1971);

D. "IN Absence of legislation by Congress, conferring jurisdiction upon State Courts, they have No jurisdiction of crimes committed by Tribal INDIANS ON INDIAN LANDS (Country) within borders of State". SEE Application of KONAKA, 131 F. 2d. 737 (7th Cir 1942);

E. "IF State Fail to implement Civil Rights Act of 1968 to Acquire jurisdiction OVER INDIAN Country then State is without jurisdiction OVER those INDIANS". SEE FRANCISCO V. STATE, 113, 427, 556 P. 2d 1 (ARIZ 1976).

F. "Absent Compliance with 25 USC 1322 (a) {INDIAN Civil Rights Act/Civil Rights Act of 1968}, State Courts CAN EXERCISE NEITHER Civil NOR CRIMINAL jurisdiction OVER

THE UNITED STATES JURISDICTION PERTAINING TO TRIBAL
AND INDIVIDUAL INDIANS CONSIST OF THE FOLLOWING:

- I. THE APPROPRIATION ACT OF 1871, MADE INDIVIDUAL AND
TRIBAL INDIANS THE EXCLUSIVE JURISDICTION OF THE
UNITED STATES;
- II. THE INDIAN CITIZENSHIP ACT OF 1924, MADE
ALL INDIANS, UNITED STATES CITIZENS WITH
THE IMMUNITIES AND/OR PRIVILEGES OF THE 14TH
AMENDMENT, SECTION 1 OF THE U.S. CONSTITU-
-TION. SEE THE SLAUGHTERHOUSE CASES (1873);
- III. "ARTICLE I, SECTION 8 OF THE U.S. CONSTITUTION MADE
INDIAN RELATIONS EXCLUSIVELY WITH THE UNITED STATES."
SEE ONEIDA INDIAN NATION V. COUNTY OF ONEIDA (1974)
- IV. Membership Requirements into the Saw Creek AND
PINE RIDGE INDIAN COMMUNITIES TRIBAL GOVERNMENT
ACCORDING TO DECREE I, SECTION VIII, "WHEREAS, member-
-ship into the tribe is by direct bloodline to the
ABORIGINAL/INDIAN TITLE HOLDER, PRINCIPAL CHIEF TONIA'
SCOTT AND/OR KINSHIP TO THE ABORIGINAL TITLE HOLDER,
PRINCIPAL CHIEF TONIA' SCOTT, AS REQUIRED IN THE
CONSTITUTION OF THE SAW CREEK AND PINE RIDGE
INDIAN COMMUNITIES, ARTICLE IV CITIZENSHIP, SECTION I
"ALL CITIZENS OF THE SAW CREEK AND PINE RIDGE

INDIAN Communities must be original enrollees
or descendants of original enrollees listed on
the Saw Creek AND Pine Ridge Indian Communi-
-ities Rolls,"

Outline of Events

On November 18, 2019, At About 12:15 pm, Plaintiff, Principal Chief Tonika Scott of the Saw Creek AND Pine Ridge Indian Communities Tribal Government, Deputy Chief Keebra Scott Harris AND FIVE (5) Tribal Law Enforcement Officers were illegally AND unlawfully Arrested by about twenty (20) Pennsylvania State Police Officers on the Pike County Land recorded Indian Title hamlet of Pine Ridge. The P.S.P. Troopers tribally AND federally criminally trespass-
-ED ON INDIAN LAND Against the direction of the Pennsylvania General Counsel, Attorney John J. Hermann-
-N, Plaintiff AND six (6) Tribal Officials were restrain-
-ED with handcuffs AND ankle shackles. THEN ELEVEN (11) hours later transported to the Pike County Correctional Facility.

Plaintiff was physically AND mentally ASSAULTED by Defendant, Warden Craig Lowe Staffers, in an effort to threaten, coerce, oppress, intimidate AND injure Plaintiff into contracting with Pike County Correctional Facility for housing AND serv-
-ices, thus constituting False Imprisonment,

Plaintiff has lost her liberty AND personal property. Plaintiff's property WAS illegally AND unlawfully seized by the P.S.T., Blooming Grove Station (Troop R); A 25 USC 2, Section 1.4, violation AND Fourteen (14th) Amendment violation of the U.S. Constitution.

ON 10/14/20, Plaintiff WAS transported to Norristown State Hospital. Norristown State Hospital is a mental facility. Plaintiff WAS handcuffed, ankle shackled AND shadowed by two (2) ARMED (w/weapons) PIKE County Police officers. Plaintiff NEVER contracted for ANY services with the PIKE County Correctional Facility or the Courts of PIKE County or the Commonwealth of PENNSYLVANIA or Norristown State Hospital, pertaining to State criminal offenses.

Plaintiff's (72pg) completed 42 USC 1983 complaint WAS stolen from her by Defendant CRAIG LOWE, PCCF Staffer AMANDA MILLS. Plaintiff had documents stolen from other Defendant, CRAIG LOWE, PCCF Staffers' Sgt. LINDA FORSHAY, (Betsy) SOUTH AND KAPILETT-SMITH, pertaining to Plaintiff's 42 USC 1983. Thus, constituting 42 USC 1985, Section 2 "If two or more persons conspire for the purpose of impeding, hindering, obstructing or defeating, in ANY manner, the due course of justice, in ANY State or territory,

with intent to deny to any citizen the equal protection of the laws, or to injure him or her or his property for lawfully enforcing, or attempting to enforce, the right of any person, or class of persons to the equal protection of the laws".

Defendants

Plaintiff never expressed AND/OR implied consent to contract into the jurisdiction of the Courts of Pike County AND/OR Norristown State Hospital AND/OR Pike County Correctional Facility AND/OR the Commonwealth of Pennsylvania in Plaintiff's individual AND/OR Tribal (official) capacity, pertaining to the Commonwealth criminal offenses against Plaintiff. As such, the Courts of Pike County lack personal jurisdiction over Plaintiff. See INTERNATIONAL SHOE V. WASHINGTON, 326 U.S. 310 (1945)

The Saw Creek and Pine Ridge Indian Communities Tribal Government NEVER contracted with the Commonwealth of Pennsylvania for Assumption by State of Civil or Criminal Jurisdiction (25 USC 1321 or 25 USC 1322). As such, "Absent compliance, with 25 USC 1322(a) {Indian Civil Rights Act/Civil Rights Act of 1968} State Courts CAN EXERCISE NEITHER CIVIL NOR CRIMINAL JURISDICTION OVER INDIAN COUNTRY, INDIANS." SEE McCLANAHAN V. ARIZONA STATE TAX COMMISSION, 411 U.S. 164, 93 S. Ct 1257,

IN COHEN'S HANDBOOK OF FEDERAL INDIAN LAW, "What is FEDERAL INDIAN LAW" at 1, "INDIAN tribes HAVE BEEN EXERCISING political AND cultural SOVEREIGNTY SINCE long before the ESTABLISHMENT of the UNITED STATES, AND their SOVEREIGNTY is BASED NOT ON ANY FEDERAL Authority but ON the "Principles of INTERNATIONAL LAW"

"The jurisdiction of A NATION within its own territory is EXCLUSIVE AND ABSOLUTE. It is susceptible of NO limitation, not imposed by itself. Any restriction deriving validity from an external source would imply a diminution of its SOVEREIGNTY to the extent of that restriction, AND investment of that SOVEREIGNTY to the SAME extent in that power, which could impose such restriction. All exceptions to the full AND complete power of A NATION within its own territory MUST be traced up to the "CONSENT" of the NATION itself." See the EXCHANGE V. McFADDON, 11 U.S. 116 (1812).

Plaintiff rights AND/or privileges AND/or immunities secured by Federal Statutory laws AND the U.S. Constitution were violated by the below Defendants. Plaintiff seeks ~~injunctive~~ injunctive relief, because that is prospective relief, in which State AND Local Officials may be sued". See Monelle v. Dept of Social Services (1978).

"The U.S. Supreme Court STATE, SECE AND
 Local officials may be sued in their personal
 capacity, where the suit seeks to impose indiv-
 -idual personal liability on the government off-
 -icer for actions taken under color of State Law
 with the badge of State Authority under the
 14th Amendment. Plaintiff may begin an action
 under 42 USC 1983, if their rights, privileges or
 immunities secured by Federal Statutory Laws
 were violated". SEE Monelle v. Department of
Social Service, 436 U.S. 658 (1978)

Defendant, Raymond Tonkin

Defendant, Raymond Tonkin intentionally obstructed Justice
 by refusing to acknowledge Plaintiff Native American/
 Indian Tribal status as well as the other Saw Creek
 and Pine Ridge Indian Communities Tribal officials
 status. Defendant Raymond Tonkin continued to
 impose State Court prosecution even when Defendant
 Tonkin had knowledge from Plaintiff that he lacked
 jurisdiction. Defendant Tonkin was hand delivered
 both Indian Titles of the Saw Creek and Pine Ridge
 -ge Pike County recorded properties, Decree #17,
 25 USC 2, Section 1.4, the Pennsylvania General
 Counsel letter and etc., by Plaintiff during the
 Pike County Court Preliminary Hearing of 12/18/19.

THE SAME DOCUMENTS THAT WERE HAND GIVEN TO DEFENDANT, TONKIN WAS FAXED AND CONFIRMED ON 12/19/19. Plaintiff, "Petition to Dismiss State Offenses, Due to Defect of Jurisdiction AND Return Tribal Property" WAS MAILED ON 1/20 AND 2/20 (JANUARY, 2020 AND February 2020). The petition WAS ACCEPTED AND RECORDED by the PIKE County Administrator of the Courts. Even, when Plaintiff 28 USC 2241, Habeas Corpus WAS given to Defendant Tonkin by the U.S. District Court of Middle Pennsylvania, 7/20. (July 2020), Defendant Tonkin continue to proclaim that the Commonwealth of Pennsylvania had jurisdiction to prosecute Tribal members, ON INDIAN Title LAND. Thus, constituting an intentional reckless suppression of evidence. Defendant Tonkin prepared documentations to force Plaintiff to be held in false imprisonment, (35 C.J.S. 9-10) in both Norristown State Hospital AND PIKE County Correctional Facility. Defendant TONKIN WAS well aware that he lacked personal AND/or territorial (subject matter) jurisdiction over Plaintiff, the Tribal officials AND/or the INDIAN Title real estate of Saw Creek AND/or Pine Ridge. Thus, creating a, "ZONE of DANGER," both insti-

- utitions have a reputation for inflicting physical AND emotional distress upon the unfortunate inhabitants. As such, Defendant Tonkin may be held liable in his individual capacity as a prosecutor. See Stockdale Et. Al. V. Helper Et. Al, No. 3 (2017), (CV00241) Document 27 "M.D. Tenn. 2017." Defendant Tonkin impeded, hindered AND obstructed Plaintiff due course of justice with the intent to deny Plaintiff the equal protection of the laws of the U.S. Constitution AND Federal Statutory Laws." Thus, causing intentional infliction of emotional distress upon Plaintiff. See Austin V. Pennsylvania State University, No. 1:14-CV-2480, 2015 WL 9660019, at *11 (M.D. PA June 9, 2015).

Defendant, Raymond Tonkin, had NO Authority from Congress AND/or the S.C.P.R.I.C. Tribal Government to impose State Criminal offenses/charges against Plaintiff AND/or the six (6) Tribal Officials. Defendant Tonkin actions violated 25 USC 1321 {Assumption of State by Criminal Jurisdiction} AND/or 25 USC 1324 {Amend State Laws}. As confirmed in McClanahan V. Arizona State Tax Commission, 411 U.S. 164, 93 S. Ct. 1257, 36 L. Ed. 2d (1973), "Absent Compliance with 25 USC 1322 (A), {Indian Civil Rights Act of 1968} State Courts CAN exercise neither civil nor criminal jurisdiction OVER Indian Country, Indians."

USE AND REVELATION OF TRIBAL LANDS - A MATTER
of Tribal Self-government properly left to the
jurisdiction of Tribal Court". SEE COWAN V. Rosebud
Sioux Tribe, 405 F. Supp. 1338 DSD. (1975). (13)

Defendant, Raymond Tonkin, "motive" in ~~maintaining~~ maintaining the false narrative of Plaintiff and the six (6) Tribal Officials as Deviants of the Commonwealth of Pennsylvania, "seems" to be that Defendant Tonkin will be humiliated and embarrassed by the same media outlets (newspapers, internet, radio and television) that he solicited the fabrication and intentional reckless suppression of evidence that the Pike County recorded Indian Title property of Pine Ridge is not in the jurisdiction of the Commonwealth of Pennsylvania and/or the Pike County District Attorney, Defendant Raymond Tonkin but in the jurisdiction of the Saw Creek and Pine Ridge Indian Communities Tribal Government.

Defendant, Lt. Michael Joyce.

Defendant, Lt. Michael Joyce of the Pennsylvania State Police, Blooming Grove Station (Troop R), located at 434 Route 402, Hawley, PA 18428. Plaintiff request the Court to ADD Defendant, Lt Michael Joyce as the "Keeper", pertaining to Plaintiff Relief, Section IV, in which Plaintiff prays that the Court issues an injunction to the Pennsylvania State Police to return Plaintiff personal

Defendant, Lt. Michael Joyce violated 25 USC 2, Section 1.4, in which states that, "State Law DO NOT Apply to INDIAN LANDS or INDIAN personal PROPERTY." Yet Defendant, Lt. Michael Joyce is the "Keeper," of Plaintiff personal property that was illegally AND unlawfully seized by the P.S.P. (Troop R) Troopers; Since 11/18/19, until present. When Plaintiff AND the six (6) other Tribal officials were abducted from the INDIAN Title hamlet of PINE RIDGE AND SHADOWED by ARMED (with military guns) P.S.P. Troopers AS Plaintiff AND the six (6) Tribal officials were forced to the Blooming GROVE Station AS they WERE EACH HANDCUFFED AND ANKLE SHACKLED. See Exhibit N AND Exhibit Q2

Defendant, Jessica Keith

Defendant, Jessica Keith is the CEO of Norristown State Hospital. Defendant Keith is the "KEEPER," AS Defendant Craig Lowe is the "KEEPER," of PIKE County Correctional Facility. At Norristown State Hospital, Plaintiff had, endured three (3) physical altercations with a violent schizo-phrenic patient NAMED Alexis (this is her 3rd 4th time at Norristown State Hospital). Alexis

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PULLED OUT A CHUNK OF PLAINTIFF'S HAIR DURING ONE OF THE ALTERCATIONS). THERE ARE SEVERAL PATIENTS LIKE ALEXIS AT NORRISTOWN STATE HOSPITAL WITH A HISTORY OF VIOLENT SCHIZOPHRENIA AND WHOM ARE REPEAT PATIENTS OF THE HOSPITAL. THESE VIOLENT SCHIZOPHRENIC PATIENTS HAVE DAILY VERBAL AND/OR PHYSICAL CONFLICTS WITH OTHER PATIENTS AS WELL AS STAFFERS. PLAINTIFF MUST ENDURE DAILY AND NIGHTLY YELLS AND SCREAMS FROM MEDICATED SCHIZOPHRENIC PATIENTS. PLAINTIFF IS SLEEP DEPRIVED. ALSO PLAINTIFF SHARES AN UNLOCKED (OPEN WIDE) ROOM WITH THREE (3) OTHER REPEAT VIOLENT SCHIZOPHRENIC PATIENTS. THERE ARE FOUR (4) OTHER UNLOCKED ROOMS WITH OVER TWELVE (12) MEDICATED VIOLENT SCHIZOPHRENIC PATIENTS ON PLAINTIFF FLOOR. SEE EXHIBIT P₂

DEFENDANT DR. SUDARSHAN BAGCHI

PLAINTIFF HAS BEEN ATTEMPTED TO BE EXTORTED BY DEFENDANT, JESSICA KEITH STAFFER DEFENDANT DR. SUDARSHAN BAGCHI TO TAKE SIMILAR DAILY MEDICATION AS THE VIOLENT SCHIZOPHRENIC PATIENTS AT THE NORRISTOWN STATE HOSPITAL, IN ORDER TO BE RELEASED FROM THE HOSPITAL. PLAINTIFF REFUSED. ALTHOUGH PLAINTIFF HAS NO FAMILY AND/OR PERSONAL HISTORY OF SCHIZOPHRENIA. PLAINTIFF NEVER CONTRACTED FOR

housing AND/or Services with Defendant Keith (15)
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AND/or Norristown State Hospital. Defendant, Jessica
Keith AND Defendant Dr. Bagchi ACTIONS HAVE
PRODUCED intentional infliction of Emotional Dis-
tress upon Plaintiff. SEE Hoy v Angelone, 291
A. 2d. 476, 482 (Pa Sup. Ct 1997). Plaintiff entreat
the Court to ADD Defendant, Dr. Sudarshan
Bagchi to Plaintiff 42 USC 1983 Complaint

Defendant Jessica Keith AND Defendant, Dr.
Sudarshan Bagchi violated Plaintiff liberty, by
forcing her to endure physical AND emotional abuses
threats AND constitutional violations under the
color of State Authority. Plaintiff is not a
State citizen. Plaintiff has NO contracts with
Defendant Jessica Keith for housing nor services
Plaintiff would. repeatedly proclaim her desire to
leave Norristown State Hospital, yet Defenda-
nt, Jessica Keith staffers would not comply.
Thus, constituting, False Imprisonment for
Plaintiff, 35 C.J.S. 9-1D. Hence, according to
the 14th Amendment, Section 1, of the U.S.
Constitution, "State laws must Not abridge
the privileges or the immunities of the U.S.
citizen." As an Indian/Native American woman

AND A tribal official of the same State of Pennsylvania that recognize the tribe of Plaintiff AND employes Defendant, Jessica Keith AND Defendant, Dr. Sudarshan Bagchi, Both Defendants ignored, "From the very first days of our government, the Federal Government had been permitting the Indians largely to govern themselves free from State interference."

SEE McClanahan v. Arizona State Tax Commission, 411 U.S. 164 (1973) at 686-687, Plaintiff WAS brought to U.S.H. on 10/14/20, handcuffed, ankle-shackled AND SHAWED by two (2) Pike County Police officers.

Defendant, Lt. Floyd Bowen

Defendant, Lt. Floyd Bowen was the chief of the Pennsylvania State Police, Blooming Grove Station (Troop R), located at 434 Route 402, Hawley, PA 18428. On November 18, 2019, Plaintiff, Principal Chief Tonika Scott of the Saw Creek AND Pine Ridge Indian Communities Tribal Government Deputy Chief Keeba Scott Harris AND five (5) Tribal Law Enforcement Officers were illegally AND unlawfully arrested by about twenty (20) Pennsylvania State Police officers on the Pike County LAND recorded Indian Title hamlet of Pine Ridge. Defendant, Lt. Floyd Bowen was present during the Tribal Officials AND Plaintiff arrest on the Indian Title property

OF PINE RIDGE. Defendant, Lt. Floyd Bowen (17)(17) informed Plaintiff AND Deputy Chief KEEBA Scott Harris that the reason the PENNSYLVANIA State Police AND Defendant Lt. Floyd Bowen, constitutionally violated Plaintiff AND the other Tribal Officials rights AND/or privileges AND/or immunities WAS because, "You are going to remove some White People." When Plaintiff questioned Defendant Bowen AND the PENNSYLVANIA State Police Officers actions of overthrowing a Tribal government. Defendant Bowen response was IN ACCORDANCE to the Tribal Officials actions of legally AND lawfully ejecting criminal trespassers from the Indian Title hamlet of PINE RIDGE. Defendant Bowen violations were also AGAINST the orders of PENNSYLVANIA General Counsel, Attorney John J. Herman who communicated by letter that the PENNSYLVANIA State Police, "Would Not get involved" pertaining to criminal offenses on the PIKE County recorded INDIAN Titles of Saw Creek AND PINE RIDGE. "Holding that in order to be individually liable UNDER 1983, individual must personally participate in alleged rights deprivation". SEE AVALOS V. BACA, 596 F. 3d 583, 587 (9th Cir 2010).

The Tribal Officials AND Plaintiff were threatened,

intimidated, handcuffed AND ~~intimidated~~ by the P.S.P. Troopers AT the direction of Defendant Bowen. Within eleven (11) hours later, Plaintiff AND the six (6) Tribal officials were shadowed by P.S.P Troopers AND restrained again, with handcuffs AND ANKLE shackles AND transported to Pike County Correctional Facility for False Imprisonment, 35 C.J.S. 9-10. After eleven (11) months of torture, abuses AND deprivations, Plaintiff WAS transported to Norristown State Hospital to be placed into another location to continue her False Imprisonment, 35 C.J.S. 9-10.

Plaintiff never express AND/or ~~express~~ implied consent to be shadowed by two (2) ARMED Pike County Police officers, while Plaintiff WAS handcuffed AND ANKLE shackled ON 10/14/20. Defendant, Bowen intentionally inflicted emotional distress upon Plaintiff, See Regan v. Twp. of Lower Merion, 36 F. Supp. 2d 245, 251 (E.D. Pa 1999). Defendant Bowen violated Plaintiff, constitutional AND Federal statutory rights AS Supervisor of the Pennsylvania State Troopers, in which Defendant Bowen supervised, participated, delegated AND monitor

11/18/19.

(19)

ED THE
ACTIVITIES
OF THE
P.S.P.

SEE ROED V. DELLARCIPRET, 845 F.2d, 1195, 1207
(3D Cir 1988)

TROOPERS
ON THE

Apparently, their, "APPEARS" to be AN ASSOCIATION
with Defendant Bowen AND (Troop R) P.S.P. Bloom-
-ing Grove Station with deprivation of U.S. citizen
rights AND/or privileges AND/or immunities. Such AS,
IN 2015, Trooper Nicole Palmer WAS RAPED, sexual-
-ly ASSAULTED AND later sexually HARASSED by her
CO-WORKER, A male Trooper, who WAS ALSO employed
AT the P.S.P. Station, Blooming Grove (Troop R) with
Trooper Palmer. The allegations were investigated
by Defendant, Lt. Floyd Bowen, who WAS quoted
AS SAYING to Trooper Nicole Palmer AND witne-
-SSSED by her boyfriend that, "We take care of
our own." Before she WAS later SHADOWED by two
(2) ARMED PENNSYLVANIA State Troopers into A
Psychiatric institution. Trooper Palmer Never
implied or EXPRESSED consent to be committed
to A psychiatric hospital, similar to Plaintiff
Tonia' Scott's ~~experience~~ experience. SEE
PALMER V. PENNSYLVANIA State Police, Civil No.
3 (17-CV00371), Middle District of Pennsylvania.

THERE seems to be A custom of Constitutional
Abuses by the P.S.P., Blooming Grove Station
(Troop R). SEE Adickes V. S. H. Kress AND Co.

398 U.S. 444 (1970), "The U.S. Supreme Court held that custom for the purpose of Section 1983 must have the force of law by virtue of the persistent practices of State officials. A political subdivision of the State may have a custom with force of law, even if that custom is not applied State wide."

Plaintiff has a negative history with the P.S.P. Blooming Grove (Troop R), beginning in November 2016, when Trooper Stinco from Troop R visited the Indian Title hamlet of Saw Creek and threatened Plaintiff, P.C. Tonra' Scott and her sister, D.C. Keeba Scott Harris, to leave the Indian Title hamlet or they would be removed by force and arrested, if they did not comply. Plaintiff, P.C. Tonra' Scott presented the Pike County recorded, Indian Title of Saw Creek to Trooper Stinco. After reading the Saw Creek Indian Title, Trooper Stinco gave the document back to Plaintiff, P.C. Tonra' Scott and said that he did not care, then proceeded to escort Plaintiff and D.C. Keeba Scott Harris from the Indian Title hamlet of Saw Creek. The whole incident was video taped. Officer Stinco intentionally disregarded the Pennsylvania Real Estate Law, Pennsylvania Real Estate Affidavits Affect

-ING
Titles
Act of
November
5, 1981
P.L.

→ 328, 118, 218, 118, "Providing the recording of certain Affidavits affecting the title to real estate AND for their Admissibility into evidence THERE "Appears" to be a policy of discrimination AGAINST INDIANS AND/OR women, from the employees of the PENNSYLVANIA State Police, Blooming Grove Station, (Troop R). Apparently, Trooper Stined sentiments were correct because three (3) years later on the PIKE County recorded INDIAN Title hamlet of PINE RIDGE, Plaintiff, D.C. KEEBA Scott Harris AND five (5) other Tribal officers were forcefully Abducted with ANY P.S.P. Trooper Verbalizing ANY MIRANDA Rights to Plaintiff, which is a Fifth Amendment violation of the U.S. Constitution. SEE MIRANDA V. ARIZONA (1966). Also, "THERE IS NO rigid rule by which to resolve the question whether a particular State Law may be Applied to INDIAN Country or to Tribal members. See White Mountain Apache Tribe v. Bracker 448 U.S. 136, 142 (1980)

Defendant, Lt. Floyd Bowen, violated 25 USC 132 (No Assumption by State of Criminal Jurisdiction), when Defendant Bowen AND Almost twenty (20) P.S.P. Troopers criminally trespassed on the INDIAN Title property of PINE RIDGE AND Overthrew A Tribal Government AND

Forcefully Abducted Plaintiff AND the SIX (6) Tribal Officials. Defendant, Lt. Floyd Bowen WAS (22) informed by the PENNSYLVANIA General Counsel, "Not to get involved," (with the actions of the S.C. P.R.I.C. Tribal Government). Thus, in accordance to 25 USC 2, Section 1.4 (State or Local Laws Do Not Apply to INDIAN LANDS or INDIAN Personal Property). Affirmed in the Federal case, Toledo v. Pueblo (1966/1954), "THE CONDUCT of AN INDIAN Tribe is Not State ACTION". AND, "Aboriginal/ INDIAN Title creates a legally enforceable property right AGAINST ANYONE but Congress," SEE BEECHER v. Wetherby, 95 U.S. 517 at 525 (1877).

Plaintiff AND the SIX (6) Tribal Officials ENDURED eleven (11) hours at the Blooming Grove Station handcuffed to a metal bench, AGAINST Plaintiff WILL AND liberty constituting FALSE Imprisonment 35 C.J.S. 9-10. Plaintiff AND the SIX (6) Tribal Officials property WAS illegally AND unlawfully SEIZED by P.S.P. (Troop R) at the instructions of Defendant, Lt. Floyd Bowen, on the INDIAN Title hamlet of Pine Ridge. Defendant Bowen directive is a 14th Amendment violation of the U.S. Constitution upon Plaintiff AND the SIX (6) Tribal Officials rights AND/or privileges AND or immunities secured by the U.S. Constitution AND Federal Statutory Laws.

BASED
UPON THE
ABOVE
REASONS
Plaintiff
entreats

be ADDED to Plaintiff 42 USC 1983 Complaint.

Defendant Gregory Chelak

Defendant Gregory Chelak is an employee of the Political Subdivision (Private Corporation), Pike County. Defendant Chelak is a Pike County Judge / Arbitrator for the Courts of Pike County, Plaintiff AND/or the Saw Creek AND Pine Ridge Indian Communities Tribal Government Never contracted with Defendant Chelak AND/or the Pike County Corporation for civil AND/or criminal jurisdiction pertaining to the Indian Title hamlets of Saw Creek AND/or Pine Ridge AND/or the S.C.P.R.I.C. Tribal members (citizens). Yet Defendant Chelak prejuried documents to force Plaintiff into Norristown State Hospital. Plaintiff Never gave personal jurisdiction to the Courts of Pike County because the Courts of jurisdiction pertaining to offenses on the Indian Title hamlets of Saw Creek AND Pine Ridge is the Saw Creek AND Pine Ridge Indian Communities Tribal Court. SEE Iowa Mut Ins Co. v. LaPlante, 489 U.S. 918 (1987), "The Supreme Court has stated that as a matter of Federal policy AND comity, matters within the tribe's jurisdiction, 'presumptively' lie in Tribal Court". See Exhibit R

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"Holding that in order to be individually ^{able} participated ⁱⁿ 24
under 1983, individual must personally participated
in alleged deprivation." See AVALOS V. BACA, 596
F.3d 583, 587 (9th Cir 2010)

The S.C.P.R.I.C. has its own Tribal Court pertain-
-ing to the offenses on the Indian Title hamlet:
of Saw Creek and Pine Ridge. The Courts of Pike
County or any State Court would be ^{an} improper
venue because the S.C.P.R.I.C. Tribal Gover-
-nment would never consent to State Laws,
the S.C.P.R.I.C. Tribal Court would only enforce
Federal AND/OR Tribal Laws as illustrated in
the S.C.P.R.I.C. Rules of the Court, download-
-able on the Tribe website, www.sawcreekand
pinridge.com, "Indian Tribes are not States,
they have a status higher than that of
States," See NATIVE AMERICAN Church V. NAVA-
-JO Tribal Council (1959).

As such, Defendant CHAIK. has no
Authorization from the S.C.P.R.I.C. Tribal
Government for subject-matter (territorial)
jurisdiction or personal jurisdiction from
Plaintiff.

The goal of the S.C.P.R.I.C. Tribal Government
in reference to property taxes would be to
allocate those proceeds to agencies of the

United States government, such as the FEDERAL Highway Commission, the Federal Bureau of Prisons AND VARIOUS OTHER federal agencies, in which the S.C.P.R.I.C. Tribal Government will Directly utilize their services.

Hence, Defendant Chelak had NO authorization from the S.C.P.R.I.C. Tribal government to execute Any form of jurisdiction pertaining to subject-matter or territorial jurisdiction, in terms of Civil AND/OR criminal offenses on the Indian Title hamlets of Saw Creek AND/OR Pine Ridge. As well as, Defendant Chelak had NO personal jurisdiction to Plaintiff because Plaintiff gave NO personal jurisdiction to Defendant Chelak AND/OR the Courts of Pike County. SEE INTERNATIONAL SHOE V. WASHINGTON, 326 US 310 (1945).

Even, when Plaintiff was physically assaulted by Defendant Chelak staffers; two (2) Pike County Police Officers, whom man-handled Plaintiff on 3/2/20 because Plaintiff refused to "plea guilty", to the bogus State criminal offenses, in which were conjured against Plaintiff. Defendant Chelak firmly directed

to Plaintiff, "You are going to PLEA GUILTY to these Charges". Plaintiff refused AND then WAS strongly MAN-HANDLED by Defendant Chelak two (2) security guards (Pike County Police Officers). Prior to this action, Plaintiff was visibility injured AND IN PAIN from the various physical assault AND attacks by Defendant Craig Lowe staffers AT P.C.C.F. (26)

Plaintiff provided Defendant Chelak with both the INDIAN Titles of Saw Creek AND Pine Ridge, Decree #11, 25 USC 2, Section 1.4, PENNSYLVANIA Attorney General letter AND etc., The documents were MAILED AND CONFIRMED by the PIKE County Court Administrator, ON 1/20 AND 2/20 (JANUARY 2020 AND FEBRUARY 2020). Yet Defendant Chelak refused to ACKNOWLEDGE the documents existence, thus, constituting AN "intentional reckless suppression of evidence". "It is well settled that a person, subject to liability CAN be AN INDIVIDUAL SUED IN AN INDIVIDUAL CAPACITY". SEE Devereaux v. Abby, 263 F. 3d 1970, 7074 (9th Cir 2001)..

Defendant Chelak would CENSOR Plaintiff AND DC Keeba Scott Harris, during court hearings, repeatedly, when Plaintiff AND the

SIX (6) TRIBAL OFFICIALS WERE REMOVED AND TRAN-
SPORTED FROM DEFENDANT LOWE P.C.C.F, THEN FOR-
CED AND SHADOWED BY PIKE COUNTY POLICE
OFFICERS OR P.S.P TROOPERS (TROOP R) TO ~~THE~~
THE PIKE COUNTY COURTHOUSE HEARINGS. PLAINTIFF
AND THE SIX (6) TRIBAL OFFICIALS WERE
ALWAYS HANDCUFFED AND ANKLE SHACKLED DURING
HEARINGS. EACH TIME PLAINTIFF OR D.C. KEEBA.
SCOTT HARRIS WOULD ASSERT THE TRIBE'S JU-
RISDICTION OVER THE PIKE COUNTY RECORDED
INDIAN TITLE OF PINE RIDGE. BOTH PARTIES WOULD
BE CENSORED BY DEFENDANT CHELAK AND/OR
DEFENDANT TONKIN. AFTERWARDS, BOTH PLAINTIFF
AND D.C. HARRIS WOULD BE MAN-HANDLED AND
FORCE OUT OF THE COURTROOM BY PIKE COUNTY
POLICE OFFICERS. THEN THE PIKE COUNTY POLICE OFFICERS
WOULD LAUGH AND SAY TO ONE ANOTHER, "WE GOT TWO (2)
CHIEFS HERE!"

DEFENDANT MATTHEW M. OSTERBERG,

DEFENDANT, MATTHEW M. OSTERBERG IS THE CHAIR-
-PERSON COMMISSIONER OF THE POLITICAL SUB-
-DIVISION (PRIVATE CORPORATION), PIKE COUNTY.
THE PIKE COUNTY CORPORATION HAS BEEN CHARGING
THE DWELLERS ON THE INDIAN TITLE HAMLETS OF
SAW CREEK AND PINE RIDGE. PROPERTY TAXES
WITHOUT THE AUTHORIZATION OF THE ~~TRIBAL~~
TRIBAL GOVERNMENT AND STEALING THE MONETARY

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PROCEEDS FROM THE TRIBAL GOVERNMENT. PLAINTIFF (28)
HAS sent several emails, FAXES AND mail to the
PIKE County TAX ASSESSOR, DAWN CONTRERAS, to
CEASE the UNLAWFUL AND illegal extortion from the
Dwellers on the INDIAN Title hamlets of Saw
Creek AND PINE RIDGE. PLAINTIFF was informed
by Assistant PIKE County TAX ASSESSOR, LINDA
that PLAINTIFF should be glad that the PIKE
County Corporation is collecting taxes (Not
for the Tribe but for the PIKE County Corp-
-ORATION.

THE Tribe NEVER RECEIVED A DIME FROM THE
County, WHEN the Tribe Attempted to CEASE
the PIKE County's illegal AND UNLAWFUL ACTION
of evicting the Dwellers on the INDIAN
Title hamlets of Saw Creek AND PINE RIDGE,
(When the Dwellers refused to CONCEDE to
Defendant Osterberg extortion of taxes).
ON 11/18/19, when the Tribal Officials AND
PLAINTIFF began to eject the criminal tres-
-PASSERS, who were enforcing the eviction
actions for the PIKE County Corporation, the
Six (6) Tribal Officials AND PLAINTIFF were held
in FALSE Imprisonment. First by the PSP
Troopers in the Blooming Grove Station, then
in the PIKE County Correctional Facility.

Tribal Officials were handcuffed AND ANKLE SHACKLED, AS WELL AS SHADOWED by ARMED PIKE County Police Officers to be presented before the employees of the Courts of PIKE County, in which Plaintiff AND six (6) Tribal Officials were MAN-HANDLED AND CENSORED each time Plaintiff AND the six (6) Tribal Officials stated their Tribal Status AND/or the PIKE County recorded INDIAN Title properties of SAW CREEK AND/or PINE RIDGE were in the jurisdiction of the S.C.P.R.I.C. Tribal Government. Afterwards, Plaintiff AND the six (6) Tribal Officials were returned to the P.C.C.F., in which Defendant Osterberg's Agents, Defendant, CRAIG LOWE Staffers would subject Plaintiff AND the six (6) Tribal Officials to various Constitutional violations.

The motive to deprive Plaintiff AND the six (6) Tribal Officials Constitutional AND Federal Statutory rights, "Appears" to be Greed (charging illegal AND unlawful property taxes), White Supremacy AND Sovereign Citizenship. (Similar to R.I.C.O.)

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Defendant, Matthew M. Osterberg Agents
Defendant, CRAIG LOWE AND Defendant, Gregory
Chelak ACTIONS CONTRADICT THE FOLLOWING:

"Tribes possess the INHERENT AUTHORITY" TO
MAKE THEIR OWN LAWS AND TO BE RULED BY THEM
SEE WILLIAMS V. LEE, 358 U.S. 217, 220 (1959)
AND, "WITHIN THE BOUNDARIES OF INDIAN LAND
TRIBES CAN REGULATE LIKE ANY OTHER GOV-
-ERNMENT." SEE ATKINSON TRADING POST
V. SHIRLEY, 532 U.S. 645 (2001).

THE POLITICAL SUBDIVISION (PRIVATE CORPORATION)
OF PIKE COUNTY BENEFITED FROM THE SIX (6)
TRIBAL OFFICIALS AND PLAINTIFF ABSENTEE
FROM THE INDIAN TITLE HAMLETS OF SAW
CREEK AND PINE RIDGE MONETARY PROCEEDS
SUCH MONETARY PROCEEDS FINANCIALLY FUND-
-ED THE EMPLOYEES OF THE COURTS OF PIKE
COUNTY AND PIKE COUNTY CORRECTIONAL FAC-
-ILITY. ALSO NORRISTOWN STATE HOSPITAL.

THERE "SEEMS" TO BE A CO-RELATION BETWEEN
THE PIKE COUNTY CORPORATION AND THE
PARTIES THAT BENEFITTED FROM THE PIKE
COUNTY MONETARY PROCEEDS, AS WELL AS

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Plaintiff Constitutional and Federal Statutory rights being violated. Plaintiff stated in her 28 USC 2254, Habeas Corpus that Plaintiff was repeatedly harassed by Defendant Lowe (PCCF Warden) staffers. And in turn, the employees of the Courts of Pike County and Pike County Correctional Facility, "used excessive force with the shield of authority," to physically and emotionally assault and violate Plaintiff Constitutional and Federal Statutory rights, See CALIFORNIA V. HODARI D., 499 US 621, 111 S. Ct 1547 (1991);

"A person subject to liability can also be a local governing body". See Waggy v. SPANKANE COUNTY, 594 F. 3d 707, 713 (9th Cir 2010);

"An institutional Defendant, such as a School District or municipality is not entitled to qualified immunity under 1983." See Owen v. Independence, 445 US 622, 638 (1980). ("Holding that a governing body may not assert the good faith of its officers or agents as a defense to liability under 1983"). In Monelle v. Dept. of Social Services of the City of New York, 436 US 658, 691 (1978), A local body is Not

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to official governing body policy of some NAT-
-ure CAUSED A CONSTITUTIONAL TORT"

Defendant, Craig Lowe Staffers, Nicole Miller AND her supervisor. Both would taunt Plaintiff with suggestions that she needed to be medicated with "Happy Pills". THE SAME "Happy Pills," that was suggested by the Courts of Pike County, Dr. Fischbein, (Plaintiff was Never evaluated by Dr. Fischbein). Defendant Gregory Chelak signed A Writ to commit Plaintiff (without Plaintiff's consent AND/or authorization) to Norristown State Hospital. THE SAME hospital that employs Defendant, Dr. Sudarshan Bagchi, who also attempted to extort Plaintiff into taking "Happy Pills" in order to be released from Norristown State Hospital. See Exhibit R.

The Courts of Pike County declared Plaintiff, "legally" incompetent, when Plaintiff would assert her Tribal status AND Tribal jurisdiction pertaining to the Indian Title of Saw Creek AND Pine Ridge. Plaintiff is Not A State